



ACF INDUSTRIES

INCORPORATED

SHIPPERS CAR LINE DIVISION

620 NORTH SECOND STREET • ST. CHARLES, MISSOURI 63301 • (314) 723-9600

EPA Region 5 Records Ctr.



355962

B. A. GUSTAFSEN
VICE PRESIDENT
ACF INDUSTRIES, INCORPORATED
GENERAL MANAGER
SHIPPERS CAR LINE DIVISION

April 16, 1980

Ms. Sandra S. Gardebring
Director-Enforcement Division
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

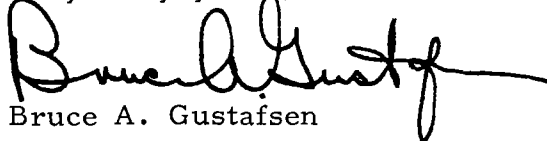
Re: Section 308 (CWA) Request
ACF Industries
Shippers Car Line Division
East St. Louis Facility
East St. Louis, Illinois

Dear Ms. Gardebring:

We are in receipt of your letter of March 17, 1980 and Request Pursuant to Section 308, Clean Water Act, pertaining to the above facility. We wish to advise that the said facility has a closed industrial waste water system composed of on-site ponds with no discharge outlets. After a careful review of the provisions of the Clean Water Act, it appears clear that the said facility does not constitute a point source, within the statutory definition contained in 33 U.S.C. 1362(14), nor is it a discharger of pollutants within the pertinent statutory definition contained in 33 U.S.C. 1362(12).

Accordingly, it appears clear that the existing fact situation does not come within the purview of Section 308 (CWA), the authorizing statute for the type of request made, and it would therefore be inappropriate for this company to take any action, as regards this facility, which would place it within a particular regulatory framework not intended by the Clean Water Act to cover the existing situation at the East St. Louis facility.

Very truly yours,


Bruce A. Gustafsen

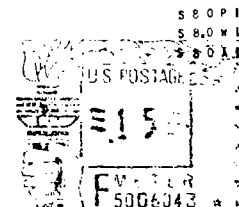
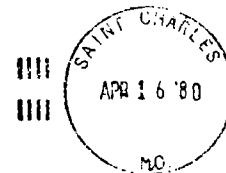


ACF INDUSTRIES

INCORPORATED

SHIPPERS CAR LINE DIVISION

620 NORTH WILMINGTON STREET, ST. LOUIS, MISSOURI 63101



Ms. Sandra S. Gardebring
Director-Enforcement Division
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

CERTIFIED MAIL - Return Receipt Requested